

The Honorable John H. Chun

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

ELIZABETH R. PADDOCK,

Plaintiff,

v.

PEACEHEALTH, INC. d/b/a ST. JOSEPH'S
MEDICAL CENTER and PEACEHEALTH
MEDICAL GROUP, BELLINGHAM
ANESTHESIA ASSOCIATES, P.S., FOURTH
CORNER NEUROSURGICAL ASSOCIATES,
INC., P.S., NORTHWEST RADIOLOGISTS,
INC., P.S., DAVID E. BAKER, M.D., JASON
M. STOANE, M.D., PAUL B. FREDETTE,
M.D., JOHN E. MORRISON, M.D., and TUNG
M. HA, D.O.,

Defendants.

Case No. 2:21-cv-00639

STIPULATION AND ORDER OF
DISMISSAL WITH PREJUDICE OF
DEFENDANT TUNG M. HA, D.O.

STIPULATION

All parties, by and through their respective counsel of record, hereby stipulate and agree that any and all claims and causes of action that were or could have been brought by Plaintiff against defendant Tung M. Ha, D.O. herein, are dismissed with prejudice and without costs and fees to any party.

STIPULATION AND ORDER OF DISMISSAL WITH
PREJUDICE OF DEFENDANT TUNG M. HA, D.O. - 1
No. 2:21-cv-00639

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Defendants PeaceHealth, Inc. d/b/a St. Joseph's Medical Center, PeaceHealth Medical Group, Bellingham Anesthesia Associates, P.S., Northwest Radiologists, Inc., P.S., Fourth Corner Neurosurgical Associates, Inc., P.S., Jason M. Stoane, M.D., Paul B. Fredette, M.D., John E. Morrison, M.D., and David E. Baker, M.D., further stipulate and agree that they will not allege that Tung M. Ha, D.O. is at fault in this matter or that the care he provided Plaintiff was below the standard of care, or that his actions and/or failures to act caused any injury or harm to plaintiff.

Defendants PeaceHealth, Inc. d/b/a St. Joseph's Medical Center, PeaceHealth Medical Group, Bellingham Anesthesia Associates, P.S., Northwest Radiologists, Inc., P.S., Fourth Corner Neurosurgical Associates, Inc., P.S., Jason M. Stoane, M.D., Paul B. Fredette, M.D., John E. Morrison, M.D., and David E. Baker, M.D., further stipulate and agree that they will not seek to allocate fault against Dr. Ha pursuant to RCW 4.22.070.

DATED this 6th day of January, 2023.

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Associates and John Morrison, M.D.

ORDER

Having come before the Court upon Parties' Stipulation and Order of Dismissal with
Prejudice, and having fully considered the same and found good cause exists therefore:


It is hereby ORDERED, ADJUDGED, and DECREED that any and all claims and
causes of action which were or could have been brought by Plaintiffs against Defendant Tung

STIPULATION AND ORDER OF DISMISSAL WITH
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M. Ha, D.O., are hereby dismissed with prejudice and without costs and fees to any party.

DATED this 6th day of January, 2023.



The Honorable John H. Chun
United States District Judge

Presented by:

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Approved as to Form and Notice of Presentment Waived:

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